

Hon. Marsha J. Pechman

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOSE LUIS OLMOS GOMEZ,

Plaintiff,

v.

KENNETH T. CUCCINELLI, et al.

Defendants.

Case No. 2:20cv1304-MJP

Stipulated Motion to Extend Deadlines

Note on Motion Calendar:  
January 4, 2021.

The parties, pursuant to Local Rules 10(g) and 16, hereby jointly stipulate and move for a 120-day extension of Defendants' deadline to file an Answer to the Complaint. The Answer is currently due January 8, 2021; the new deadline would be May 7, 2021.

A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Continuing pretrial and trial dates is within the discretion of the trial judge. *See King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986). The parties submit there is good cause for an extension of this deadline. Defendants have recently conducted Plaintiff's I-485 interview and have issued an initial decision on the adjudication of the I-485 Application for lawful permanent resident status. Under regulation, Plaintiff now has 90 days to respond to that adjudication decision. Adjudication of Plaintiff's I-485 Application would fully resolve this mandamus action without the time and expense of further

1 litigation.

2 Accordingly, the parties seek a 120-day extension of the deadline for Defendants to file the  
3 Answer.

4 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

5 DATED: January 4, 2021

s/ Alexandra Lozano

ALEXANDRA LOZANO, WSBA #40478

Alexandra Lozano Immigration Law

16400 Southcenter Pkwy., Suite 410

Tukwila, WA 98188

Phone: 206-406-3068

Fax: 206-494-7775

Email: Alexandra@abogadaalexandra.com

Attorney for Plaintiff

11 DATED: January 4, 2021

s/ Matt Waldrop

MATT WALDROP, Georgia Bar #349571

Assistant United States Attorney

United States Attorney's Office

700 Stewart Street, Suite 5220

Seattle, Washington 98101-1271

Phone: 206-553-7970

Fax: 206-553-4067

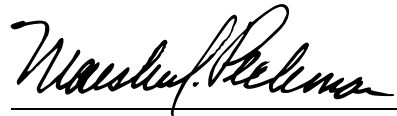
Email: james.waldrop@usdoj.gov

Attorney for Defendants

**ORDER**

**IT IS SO ORDERED.**

Dated this 4th day of January, 2021.



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Honorable Marsha J. Pechman  
United States District Judge